

August 6, 2021

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Hon. Peggy Kuo
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *NOVAGOLD Resources Inc. v. J Capital Research USA LLC*, No. 20-cv-02875-LDH-PK; Unopposed Motion to Extend Time to Join New Parties or Amend Pleadings

Dear Magistrate Judge Kuo:

We write on behalf of NOVAGOLD Resources Inc. (“NOVAGOLD”) to request a modification of the deadline to file a motion to join new parties or amend the pleadings. Currently, that deadline is August 9, 2021; NOVAGOLD requests that this deadline be extended to October 8, 2021. NOVAGOLD’s Motion to Compel, filed May 19, 2021 is presently pending before the Court with a hearing set for August 11, 2021. The documents and information NOVAGOLD seeks in its Motion are necessary for it to determine whether joinder or amendment of the First Amended Complaint is appropriate. This is NOVAGOLD’s third request for extension of this deadline pending resolution of disputes arising from its discovery served October 9, 2020. We do not believe that the requested extension would affect any other scheduled dates or deadlines; however, the timing and outcome of the Court’s ruling on NOVAGOLD’s Motion may require further amendment to the Scheduling Order.

We have conferred with counsel for JCAP regarding this request, and JCAP does not oppose the request to extend this deadline.

Respectfully,



David Genender

cc: All counsel of record (by CM/ECF)